

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

HENRY WATKINS,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	NO. 02-CV-2881
PENNSYLVANIA BOARD OF	:	
PROBATION & PAROLE,	:	
EDWARD JONES, and MICHAEL BUKATA	:	
	:	
Defendants.	:	
	:	

**JURY VERDICT FORM FOR WILLIE E. JONES**  
**IN HIS INDIVIDUAL CAPACITY**

**A. Disparate Treatment**

1. Do you find that the plaintiff has proved by a preponderance of the evidence that Defendant Willie E. Jones, in his individual capacity, subjected plaintiff to an adverse tangible employment action?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If you answered "YES" to Question 1, continue to Question 2. If you answered "NO" to Question 1, continue to Question 3 and do not answer Question 2.*

2. Do you find that the plaintiff has proved by a preponderance of the evidence that race was determinative in motivating Defendant's employment action?

YES \_\_\_\_\_

NO \_\_\_\_\_

*Continue to Question 3.*

**B. Retaliation**

3. Do you find that the plaintiff has proved by a preponderance of the evidence that he opposed a racially discriminatory practice or engaged in protected conduct during a grievance hearing in November of 2000?

YES \_\_\_\_\_

NO \_\_\_\_\_

*Continue to Question 4.*

4. Do you find that the plaintiff has proved by a preponderance of the evidence that defendant Willie E. Jones, in his individual capacity, subjected plaintiff to suspensions and termination as a result of the plaintiff's 1993 lawsuit?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If you answered "YES" to Question 3, continue to Question 5. If you answered "NO" to Question 3, continue to answer Question 6.*

5. Do you find that the plaintiff has proved by a preponderance of the evidence that there is a causal connection between the plaintiff's protected conduct during a grievance hearing in November 2000 and his termination in August 2001?

YES \_\_\_\_\_

NO \_\_\_\_\_

*Continue to Question 6.*

**C. Conspiracy**

6. Do you find that Willie E. Jones, in his individual capacity, entered into a conspiracy to discriminate and/or retaliate against Mr. Watkins?

YES \_\_\_\_\_

NO \_\_\_\_\_

**D. Damages**

*Please answer the following questions only if you found in favor of plaintiff on his disparate treatment claim, retaliation claim, and/or his conspiracy claim. In other words, you should only answer these questions if you answered "YES" to Questions 1 and 2 and/or Questions 4 and/or 3 and 5 and/or Question 6.*

7. Do you find that the plaintiff has proved by a preponderance of the evidence that plaintiff should be awarded damages to compensate for emotional pain and mental anguish?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If your answer is "YES," insert the amount of compensatory damages that will reasonably compensate plaintiff for his emotional pain and mental anguish in the space provided below.*

\$ \_\_\_\_\_

8. Do you find that the plaintiff has proved by a preponderance of the evidence that plaintiff should be awarded damages to compensate for a net loss of wages and benefits to the date of trial?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If your answer is "YES," insert the amount of compensatory damages that will reasonably compensate plaintiff for a net loss of wages and benefits in the space provided below.*

\$ \_\_\_\_\_

*If your answers to Questions \_\_\_\_ and \_\_\_\_ are "NO," insert a \$1.00 award of nominal damages below.*

\$ \_\_\_\_\_

9. Do you find that the plaintiff has proved by a preponderance of the evidence that plaintiff is entitled to recovery of future earnings from defendant?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If your answer is "YES," insert the amount of future earnings that plaintiff is entitled to in the space provided below.*

\$ \_\_\_\_\_

**E. Punitive Damages**

10. Do you find that the plaintiff has proved by a preponderance of the evidence that defendant Willie E. Jones, in his individual capacity, personally acted with malice or reckless indifference to plaintiff's federally protected rights?

YES \_\_\_\_\_

NO \_\_\_\_\_

Foreperson: \_\_\_\_\_

Dated: \_\_\_\_\_

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